October 25, 2023

VIA ECF

The Honorable Paul G. Gardephe, U.S.D.J. Thurgood Marshall United States Courthouse 40 Foley Square, Courtroom 705 New York, NY 10007

Re: Joint Letter in <u>Tang v. Tang</u>, No. 22 Civ. 5736 (PGG) (S.

so ordered. Poul 2. Londophe

Paul G. Gardephe

United States District Judge Dated: October 27, 2023

Dear Judge Gardephe:

Plaintiff Vincent Tang and Defendant Wilson Tang respectfully submit this joint letter to request a temporary adjournment of the order of dismissal (the "Order") entered on May 9, 2023, ECF No. 35. On September 27, the Court granted the Parties' prior request for an adjournment of the Order until October 25, ECF No. 44.

In their previous joint letter to the Court, dated September 24, the Parties reported that they were continuing to have active discussions on the few remaining outstanding issues to their settlement, and that they were otherwise working cooperatively with neutral corporate counsel to revise the draft the long-form settlement agreement and other documents necessary to effect the Parties' settlement, *see* ECF No. 43. Since then, including in recent days, the Parties and neutral corporate counsel have exchanged near-final versions of the long-form settlement agreement, but as of today that agreement is not yet executed.

Accordingly, the Parties respectfully request that the Court adjourn the Order's deadline from for approximately 30 days, until November 24, 2023, while the parties finalize and execute their settlement, *see* Fed. R. Civ. P. 6(a)(1)(C). The Parties are hopeful that this will be the final request for an adjournment they make to the Court on this matter.

Respectfully submitted,

Hon. Paul G. Gardephe Page 2

CAHILL GORDON & REINDEL, LLP

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Paul Morales

cc:

Michael B. Weiss
Paul G. D. Morales
32 Old Slip
New York, NY 10005
Telephone: 212-701-3000
mweiss@cahill.com
pgmorales@cahill.com

David Dong Ann Lin LEWIS & LIN, LLC 77 Sands Street, 6th Floor Brooklyn, NY 11201 Telephone: 718-243-9323 david@ilawco.com

Counsel for Plaintiff Vincent Tang

All Counsel of Record (via ECF)

By: /s/ David Salant

Orin Snyder Brian C. Ascher David P. Salant 200 Park Avenue New York, NY 10166 Telephone: 212.351.3989 OSnyder@gibsondunn.com BAscher@gibsondunn.com DSalant@gibsondunn.com

Counsel for Defendant Wilson Tang